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**From:** Howard J. Klatsky <[hklatsky@feesmith.com](mailto:hklatsky@feesmith.com)>

**Sent:** Monday, January 24, 2022 12:30 PM

**To:** Brandon J. Tittle

**Subject:** RE: Sports One - Bankruptcy Filing

Thank you. I will reach out to my client as discussed. Can you also send me written proof of current insurance (that you told me your client procured last Friday)?

**Howard J. Klatsky**

Senior Partner



Three Galleria Tower  
13155 Noel Road  
Suite 1000  
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F 972.934-9200  
[www.feesmith.com](http://www.feesmith.com)

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Thank you for your cooperation.

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**From:** Brandon J. Tittle [<mailto:btittle@tittlelawgroup.com>]

**Sent:** Monday, January 24, 2022 12:01 PM

**To:** Howard J. Klatsky <[hklatsky@feesmith.com](mailto:hklatsky@feesmith.com)>

**Subject:** Sports One - Bankruptcy Filing

Howard:

Attached for your review are the Chapter 11 Petitions for Sports One Superstores and Texas Holdings Firm Corporation that were filed last Thursday, January 20, 2022.

Please let me know as soon as possible when my client will be allowed access to the premises. The continued lockout after the petitions were filed is a violation of the automatic stay pursuant to Section 362 of the Bankruptcy Code and

could subject your client to damages. But as I stated on the phone earlier, it would be better to work through the issues amicably since my client desires to cure all defaults and assume the lease.

**TITTLE LAW GROUP**  
— A Professional Limited Liability Corporation —

*Standing tall when it matters most*

**BRANDON J. TITTLE**

**FOUNDING PARTNER**

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5550 Granite Parkway, Suite 220

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**R. Luke Graham**

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**From:** R. Luke Graham  
**Sent:** Wednesday, January 26, 2022 12:45 PM  
**To:** R. Luke Graham  
**Subject:** FW: Sports One - Bankruptcy Filing

**TITTLE LAW GROUP**  
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**R. LUKE GRAHAM**  
**ASSOCIATE ATTORNEY**  
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---

**From:** Howard J. Klatsky <[hklatsky@feesmith.com](mailto:hklatsky@feesmith.com)>  
**Sent:** Tuesday, January 25, 2022 3:14 PM  
**To:** Brandon J. Tittle <[btittle@tittlelawgroup.com](mailto:btittle@tittlelawgroup.com)>  
**Cc:** 'Robert Nicoud' <[rmnicoud@dallas-law.com](mailto:rmnicoud@dallas-law.com)>  
**Subject:** RE: Sports One - Bankruptcy Filing  
**Importance:** High

Brandon: My client, Danbury Partners, Ltd., has retained bankruptcy counsel (Robert Nicoud, who is copied on this note) to represent it in this action moving forward. Simply stated, our client is not agreeable to your "full access" request. Mr. Nicoud can/will provide you with the factual bases and legal authority supporting our position. Please direct all future communications intended for Danbury Partners, Ltd. to both me and Mr. Nicoud.

Note: Mr. Nicoud's address is:  
Nicoud Law  
10440 N. Central Expressway  
Suite 800  
Dallas, Texas 75231

Thank you in advance for your anticipated professionalism.

**Howard J. Klatsky**  
Senior Partner



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**From:** Brandon J. Tittle [<mailto:btittle@tittlelawgroup.com>]  
**Sent:** Monday, January 24, 2022 6:32 PM  
**To:** Howard J. Klatsky <[hklatsky@feesmith.com](mailto:hklatsky@feesmith.com)>  
**Subject:** Re: Sports One - Bankruptcy Filing

Howard:

The insurance will be sent to you tomorrow. Regardless of the insurance, your client is still in violation of the automatic stay. If my client is not allowed full access of the premises by 5:00 pm tomorrow (CST), we will be forced to file a motion to show cause why your client should not be held in contempt.

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**BRANDON J. TITTLE**  
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